

BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

In the Matter of

Amendment of Section 73.202(b),  
Table of Assignments  
FM Broadcast Stations  
Tyler, Fairfield,  
and Commerce, Texas

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To: Chief, Mass Media Bureau

**MAR 30 1994****PETITION FOR RULE MAKING**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Gleiser Communications Incorporated ("Gleiser"), by its attorneys and pursuant to Section 1.401 of the Commission's Rules, hereby petitions that Section 73.202(b) of the Rules be amended as follows:

**Tyler, Texas****Present**

221A, 226C1,  
268C, 281C2

**Proposed**

221C3, 226C1,  
268C, 281C2

**Fairfield, Texas****Present**

221A

**Proposed**

256A

**Commerce, Texas****Present**

221A

**Proposed**

277A

In support of such request, Gleiser states as follows:

1. Gleiser is the licensee of Station KDOK(FM), Tyler, Texas; KDOK is licensed to operate on Channel 221A. Pursuant to Section 1.420(g)(3) of the Rules, Gleiser seeks to modify its license so as to specify operation on Channel 221 as a C-3 facility. Specifically, Gleiser proposes that the Commission

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substitute Channel 221C3 for Channel 221A at Tyler and, pursuant to Section 316(a) of the Communications Act of 1934, as amended, issue an order modifying the KDOK license accordingly. Operating on Channel 221C3, KDOK will be able to increase its population and service area to encompass 192,911 persons in 4,787.2 square kilometers. This represents an increase of 57,651 persons and 3,147.5 square kilometers over its present facilities.

2. As set forth in the attached engineering statement of Graham-Brock, Inc. the substitution of Channel 221C3 at Tyler, Texas will comply with the minimum separation requirements of Sections 73.207 of the Rules as well as the minimum field strength requirements of Section 73.315(a) of the Rules.

3. In order to accommodate the assignment and use by Station KDOK of Channel 221C3 at Tyler, Texas, it will be necessary to substitute Channel 256A for Channel 221A at Fairfield, Texas, and Channel 277A for Channel 221A at Commerce, Texas. Accordingly, it will be necessary for Station KNES at Fairfield, Texas to change channel of operation from Channel 221A to 256A as well as for Station KEMM at Commerce, Texas to alter operating channel from Channel 221A to 277A. As indicated in the attached technical report, the channel substitutions for Stations KNES and KEMM can be made in full compliance with all Commission rules and policies. Moreover, the allotments of Channel 256A to Fairfield and 277A to Commerce will enable both KNES and KEMM to

operate as 6.0 kilowatt (or equivalent) Class A facilities. Presently, both stations are 3.0 kilowatt (or equivalent) facilities. Operating on the new Channel 256A, KNES will be able to serve 14,743 persons in 2,139.0 square kilometers, which represents an increase of 910 persons in 580.5 square kilometers. With respect to KEMM, operating on Channel 277A at Commerce, KEMM can provide 1.0 mV/m service to 55,963 persons in 2,274.5 square kilometers, an increase of 8,794 persons and 638.2 square kilometers over its current facilities on Channel 221A.


4. It should also be noted that Gleiser hereby states its commitment to reimburse the reasonable expenses of Stations KNES and KEMM for the changes to the new operating channels consistent with Commission policies with respect to such reimbursement. Gleiser also hereby states its commitment to apply for Channel 221C3 if allotted, to modify its facilities in order to operate KDOK on Channel 221C3.

For reasons set forth above, the public interest would be served by the foregoing proposal, and accordingly the Commission is respectfully requested to (a) issue a notice of proposed rule making to substitute Channel 221C3 for 221A at Tyler, Texas, and substitute Channel 256A for 221A at Fairfield, Texas, and Channel 277A for Channel 221A at Commerce, Texas, and (b) issue appropriate show cause orders to modify the licenses of the affected stations.


Respectfully submitted,

**GLEISER COMMUNICATIONS, INC.**

By:

  
M. Scott Johnson, Esquire

By:

  
Catherine M. Withers, Esquire

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Suite 900E  
Washington, DC 20005  
(202) 408-7100

Its Attorneys

Date: March 30, 1994

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# GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

**ORIGINAL  
FCC COPY**

**PETITION FOR RULE MAKING**  
**GLEISER COMMUNICATIONS INCORPORATED**  
**SUBSTITUTE CHANNEL 221C3 FOR 221A**  
**ORDER KDOK TO CHANGE CLASS**  
**TYLER, TEXAS**  
**March 1994**

**TECHNICAL EXHIBIT**

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**PETITION FOR RULE MAKING**  
**GLEISER COMMUNICATIONS INCORPORATED**  
**SUBSTITUTE CHANNEL 221C3 FOR 221A**  
**ORDER KDOK TO CHANGE CLASS**  
**TYLER, TEXAS**  
**March 1994**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Gleiser Communications Incorporated ("GCI"), licensee of station KDOK, Channel 221A, Tyler, Texas. GCI requests an amendment to the Commission's Table of FM allotments, §73.202(b), by substituting Channel 221C3 for Channel 221A at Tyler, Texas. Further, GCI requests that KDOK be ordered to change Class. In order to effectuate the upgrade at Tyler, Texas, it is necessary to make two additional substitutions; GCI requests Channel 256A be substituted for Channel 221A at Fairfield, Texas, and KNES be ordered to change channels and Channel 277A be substituted for Channel 221A at Commerce, Texas, and KEMM be ordered to change channels (the specific requests will be outlined in further detail below).

**NONCOMMERCIAL PRECLUSION STUDY**

2. The proposed upgrade at Tyler, Texas, (from the below noted reference site) will cause the 1.0 mV/m contour to overlap with the Grade B contour of station KTAL-TV, Channel 6, Texarkana, Texas. The KTAL-TV site is 137 kilometers from the

proposed Channel 221C3 reference site at Tyler, Texas. GCI has, therefore, conducted a thorough non-commercial preclusion study, utilizing the requirements outlined in MM Docket #88-572, in order to determine if the proposed upgrade at Tyler, Texas, would prevent the institution of new noncommercial service on Channels 218, 219 and 220.

3. In conducting the preclusion study, a noncommercial preclusion radius (arc) was established to all existing or applied for noncommercial stations. This radius was determined by the greater of the sums of the protected and respective interfering contours of the proposed channel under study or the existing facility. <sup>1</sup> Where a commercial allotment, licensed or applied for facility is under consideration the required spacing distance under §73.207 was used.

4. All classes of stations on Channel 218 are currently precluded due to the protection radius to KGLY, Channel 217C3, Tyler, Texas. Exhibit #1 shows the typical preclusion of Channel 218A. Due to the increase protection arcs from the facilities shown on Exhibit #1, Channels 218C3, 218C2, 218C1 and 218C are precluded by KGLY. <sup>2</sup>

1) The actual licensed or applied for facilities for the existing stations were used. Maximum contour distances were used for the channel under study.

2) The protection arc for KGLY completely encompasses the preclusionary arc of the existing KDOK and proposed C3 facility at Tyler, Texas, for all classes of stations on Channel 218. Additional Channel 218 preclusionary maps are not attached.

5. All classes of stations on Channel 219 are currently precluded due to the protection radius of KVTB, Channel 219C, Dallas, Texas. Exhibit #2 is the preclusionary study for Channel 219A and shows that the arc from KVTB is the main precluding factor for a new noncommercial station on Channel 219A. As was the case for Channel 218, the increase protection arcs from KVTB are, likewise, a precluding factor for Channels 219C3, 219C2, 219C1 and 219C. <sup>3</sup>

6. The potential for noncommercial preclusions on Channel 220 differs from the previous two channels. In the case of a Class A, C3 and C2 facility on Channel 220, there are areas which potentially are precluded by the proposed upgrade at Tyler, Texas. This area is bounded by KDOK (Channel 221A), the proposed Channel 221C3 and other adjacent channel commercial and non-commercial facilities, as shown on Exhibits #3 through #5. <sup>4</sup> In each case, a study was made to determine if any towns or groupings of persons of 1,000 or more were situated in the preclusion area. <sup>5</sup> On each of Exhibits #3 through #5 the

3) The protection arc for KVTB completely encompasses the preclusionary arc of the existing KDOK and proposed C3 facility at Tyler, Texas, for all classes of stations on Channel 219. Additional Channel 219 preclusionary maps are not attached.

4) Contour or spacing arcs used as appropriate to commercial or non-commercial facilities.

5) In determining the towns or groupings within the preclusion area, the towns were identified and then referenced to the 1990 census for the state of Texas. If the community had less than 1000 persons or was not listed, the town (or grouping) was not considered further.



area of preclusion is highlighted. Channel 220C1 and Channel 220C are precluded by other existing or proposed noncommercial and commercial facilities (see Exhibit #6 and #7).

7. Within the Channel 220A preclusion area (Exhibit #3) there were three towns of 1000 or more; Alto (Cherokee County), Pittsburg (Camp County) and Lone Star (Morris County). While these communities are in the preclusion area, it is feasible that Channel 220A could be restricted from the community and meet the necessary spacing and protection from interference requirements of the Commission's rules. The site restrictions are such that the required signal can be provided over each community. <sup>6</sup>

8. In the Channel 220C3 preclusion area (Exhibit #6), three communities were identified; Mount Pleasant (Titus County), Daingerfield (Morris County) and Hughes Springs (Cass County). Again, it is feasible that Channel 220C3 could be restricted from these communities and meet the necessary spacing and protection from interference requirements of the Commission's rules. The site restrictions are such that the required signal can be provided over each community. <sup>7</sup>

6) The actual site restrictions on Channel 220A are; Alto (9.0 kilometers south), Pittsburg (10.2 kilometers north) and Lone Star (4.5 kilometers east).

7) The actual site restrictions on Channel 220C3 are; Mount Pleasant (3.7 kilometers north), Daingerfield (11.0 kilometers northwest) and Hughes Springs (4.2 kilometers east).

9. The Channel 220C2 preclusion area (Exhibit #7) contains only one community with population in excess of 1000 persons; Nacogdoches (Nacogdoches County). It is feasible that Channel 220C2 could be restricted from Nacogdoches and meet the necessary spacing and protection from interference requirements of the Commission's rules. The site restriction is only 17.8 kilometers south and is such that the required signal can be provided over the community. <sup>8</sup>

10. Due to the potential for site restricting the respective channels the upgrade at Tyler, Texas, impacts and those channels which are not impacted by the GCI proposal, there does not appear to be any actual preclusion to noncommercial service as a result of this proposal.

#### **PROPOSAL**

11. Channel 221C3 can be allotted to Tyler, Texas, at geographic coordinates North Latitude 32° 20' 42" and West Longitude 95° 19' 08". This represents a site restriction of 1.6 kilometers west of the community to avoid shortspacing KCUL-FM, Channel 222A, Marshall, Texas. From the reference site, Channel 221C3 will provide 3.16 mV/m coverage over Tyler,

8) Nacogdoches presently receives noncommercial service from KSAU, Channel 211C3, Nacogdoches, Texas.

Texas. Attached as Exhibit #8 is a usable area for Channel 221C3 at Tyler, Texas. Exhibit #9 is a §73.207 spacing analysis which demonstrates that Channel 221C3 meets the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities. Both Exhibits #8 and #9 assume that KNES and KEMM are operating on their respective substitute channels (as described below).

12. Channel 256A can be substituted for Channel 221A at Fairfield, Texas, at coordinates North Latitude 31° 41' 52" and West Longitude 96° 09' 44". This is the present KNES licensed transmitter site. From this location, a 3.16 mV/m contour will continue to be delivered to Fairfield. Exhibit #10 is a usable area for Channel 256A at Fairfield, Texas. Exhibit #11 is a spacing study for the channel and demonstrates that under §73.207 of the Commission's rules the channel is clear of all licensed, applied for or proposed facilities.

13. Channel 277A can be substituted for Channel 221A at Commerce, Texas, at coordinates North Latitude 33° 11' 40" and West Longitude 96° 01' 20". This is the present KEMM licensed transmitter site. From this location, a 3.16 mV/m contour will continue to be delivered to Commerce. Exhibit #12 is a usable area for Channel 277A at Commerce, Texas. Exhibit #13 is a

spacing study for the channel and demonstrates that under §73.207 of the Commission's rules the channel is clear of all licensed, applied for or proposed facilities.

14. Therefore, GCI proposes the following changes to the Commission's Table of FM Allotments:

Tyler, Texas

<u>Present</u>	<u>Proposed</u>
221A, 226C1, 268C, 281C2	221C3, 226C1, 268C, 281C2

Fairfield, Texas

<u>Present</u>	<u>Proposed</u>
221A	256A

Commerce, Texas

<u>Present</u>	<u>Proposed</u>
221A	277A

PUBLIC INTEREST ASPECTS

15. The allocation of Channel 221C3 will enable KDOK to increase its population and service area to encompass 192,911 persons in 4,787.2 square kilometers. This represents an increase of 57,651 persons and 3,147.5 square kilometers over its

present licensed facility.<sup>9</sup> Further, the allotments of Channel 256A to Fairfield and 277A to Commerce will enable both KNES and KEMM to operate as 6.0 kilowatt (equivalent) Class A facilities. Presently, both stations are 3.0 kilowatt (or equivalent) facilities.

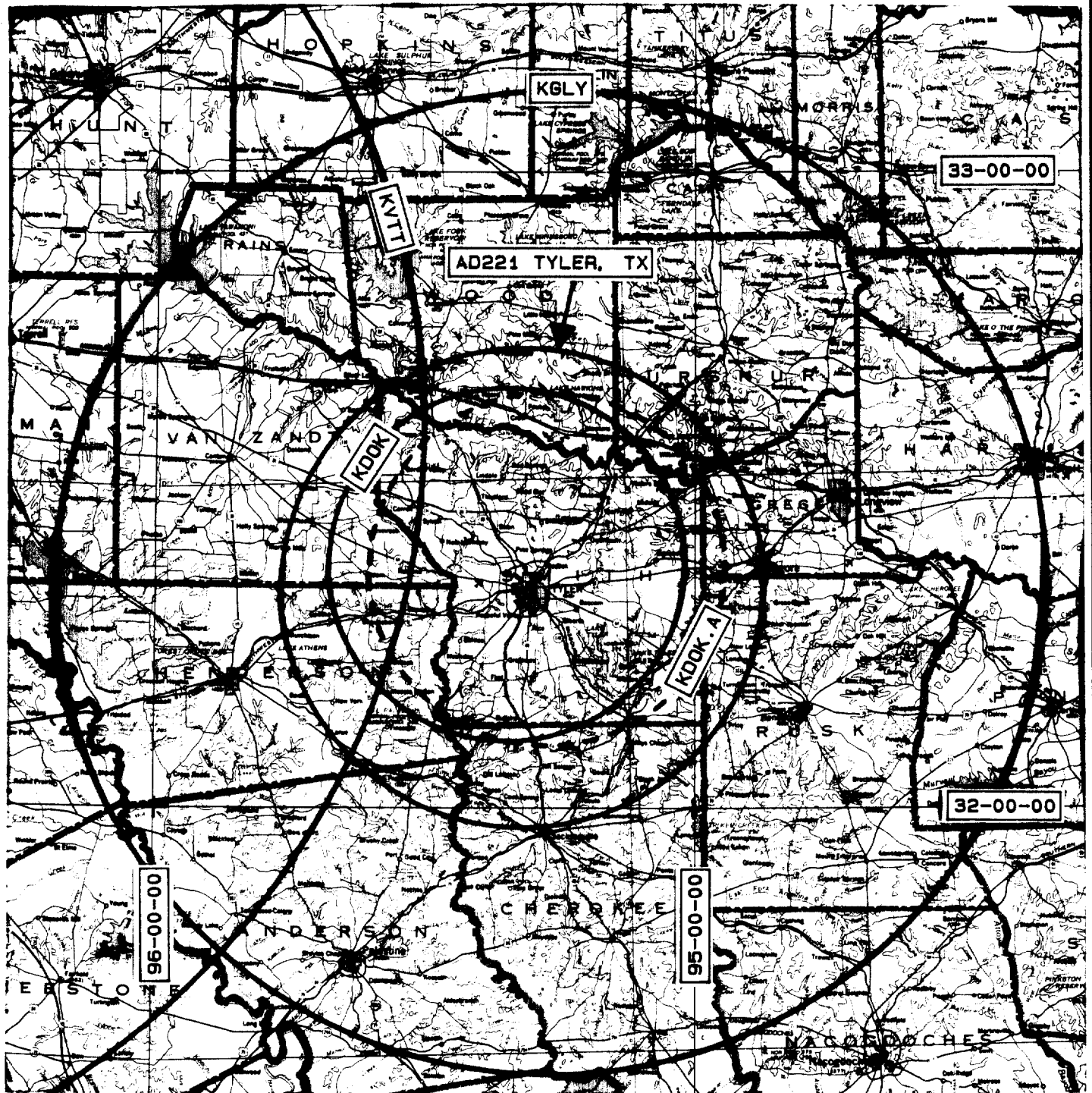
16. The change of channels at Fairfield will allow KNES to serve 14,743 persons in 2,139.0 square kilometers. This represents an increase of 910 persons in 580.5 square kilometers over the present facility. In addition, the substitution of channels at Commerce will allow KEMM to provide 1.0 mV/m service to 55,963 persons in 2,274.5 square kilometers, an increase of 8,794 persons and 638.2 square kilometers over its licensed facilities on Channel 221A.

17. When Channel 221C3 is allotted to Tyler, Texas, GCI will file an application to make minor changes in the facilities of KDOK. Further, GCI states its willingness to reimburse the licensees of both KNES and KEMM for reasonable expenses to effectuate the channel changes at both communities.

18. The foregoing technical statement was prepared on behalf of Gleiser Communications Incorporated by Graham Brock, Inc., its Technical Consultants. All the information contained

<sup>9</sup> GCI presently has on file an application to relocate KDOK to a new site, file #BPH-931013IB. The population gain for the C3 facility over the proposed Class A site is 52,287 persons in 2,959.5 square kilometers.

herein in true and accurate to the best of our belief and knowledge. Should questions arise during consideration of these requests, we welcome to opportunity to discuss the matter by phone at (912) 638-8028. All data relating to FM facilities was extracted from the NTIA database, as updated in November, 1993. We assume no liability for errors or omissions in that database which may be adverse to the requests contained herein.



# CHANNEL 218A PRECLUSION STUDY

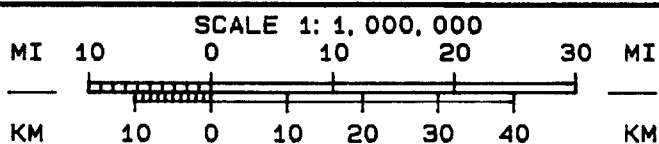
MAP IS A PORTION OF THE 1: 1,000,000 SCALE  
U.S.G.S. BASE MAP OF TEXAS.

SEE EXHIBIT #1A FOR THE LIST OF STATIONS  
SHOWN ON EXHIBIT #1.

# EXHIBIT #1

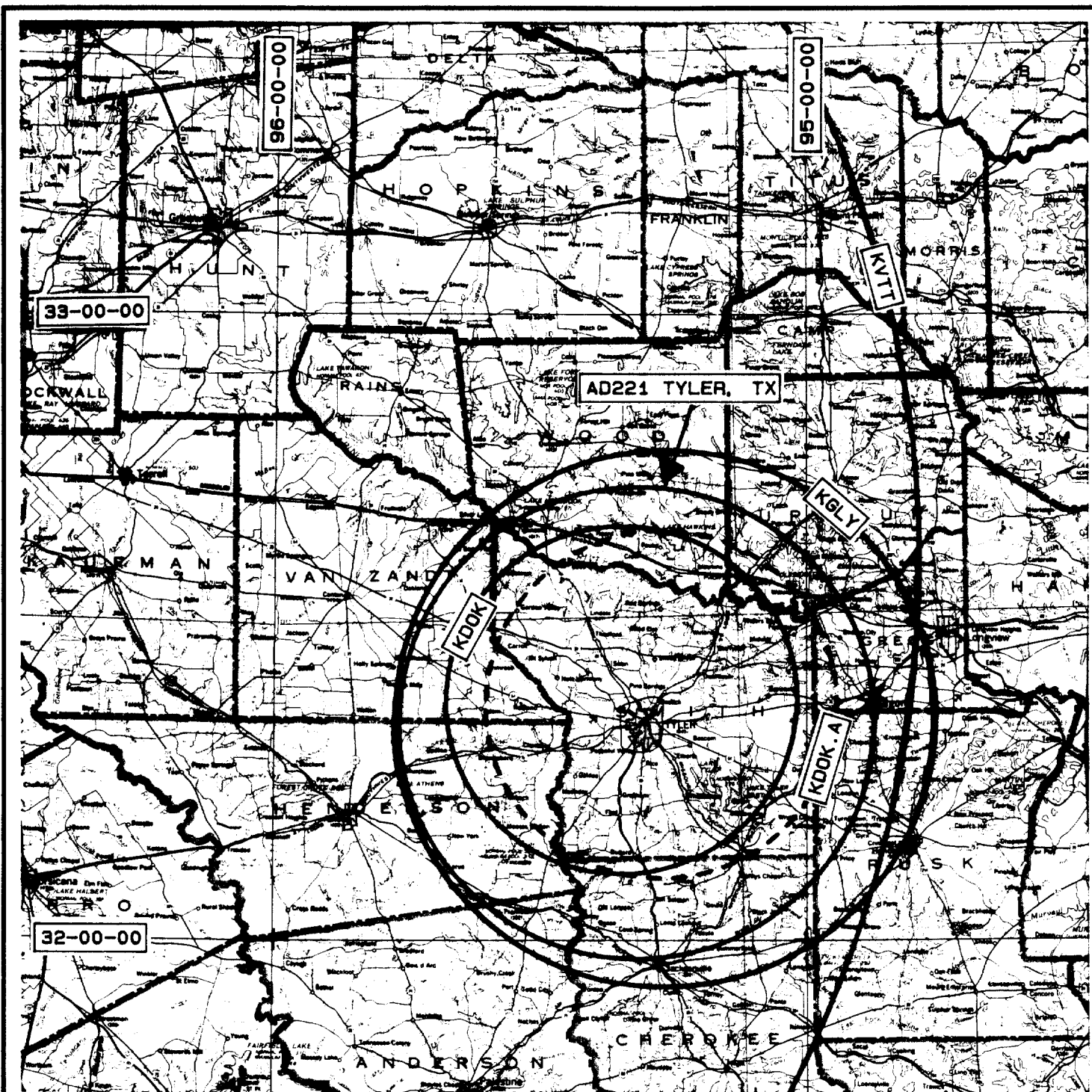
PETITION FOR RULE MAKING  
GLEISER COMM., INC.  
KDOK RADIO STATION  
SUB CH 221C3 FOR CH 221A  
TYLER, TEXAS

January 1994



# GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS



# CHANNEL 219A PRECLUSION STUDY

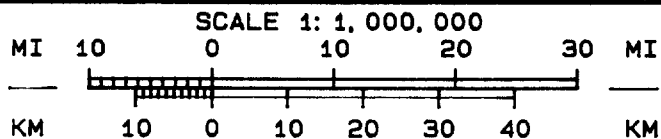
MAP IS A PORTION OF THE 1: 1, 000, 000 SCALE  
U.S.G.S. BASE MAP OF TEXAS.

SEE EXHIBIT #2A FOR THE LIST OF STATIONS  
SHOWN ON EXHIBIT #2.

## EXHIBIT #2

PETITION FOR RULE MAKING  
GLEISER COMM., INC.  
KDOO RADIO STATION  
SUB CH 221C3 FOR CH 221A  
TYLER, TEXAS

January 1994



**GRAHAM BROCK, INC.**  
BROADCAST TECHNICAL CONSULTANTS



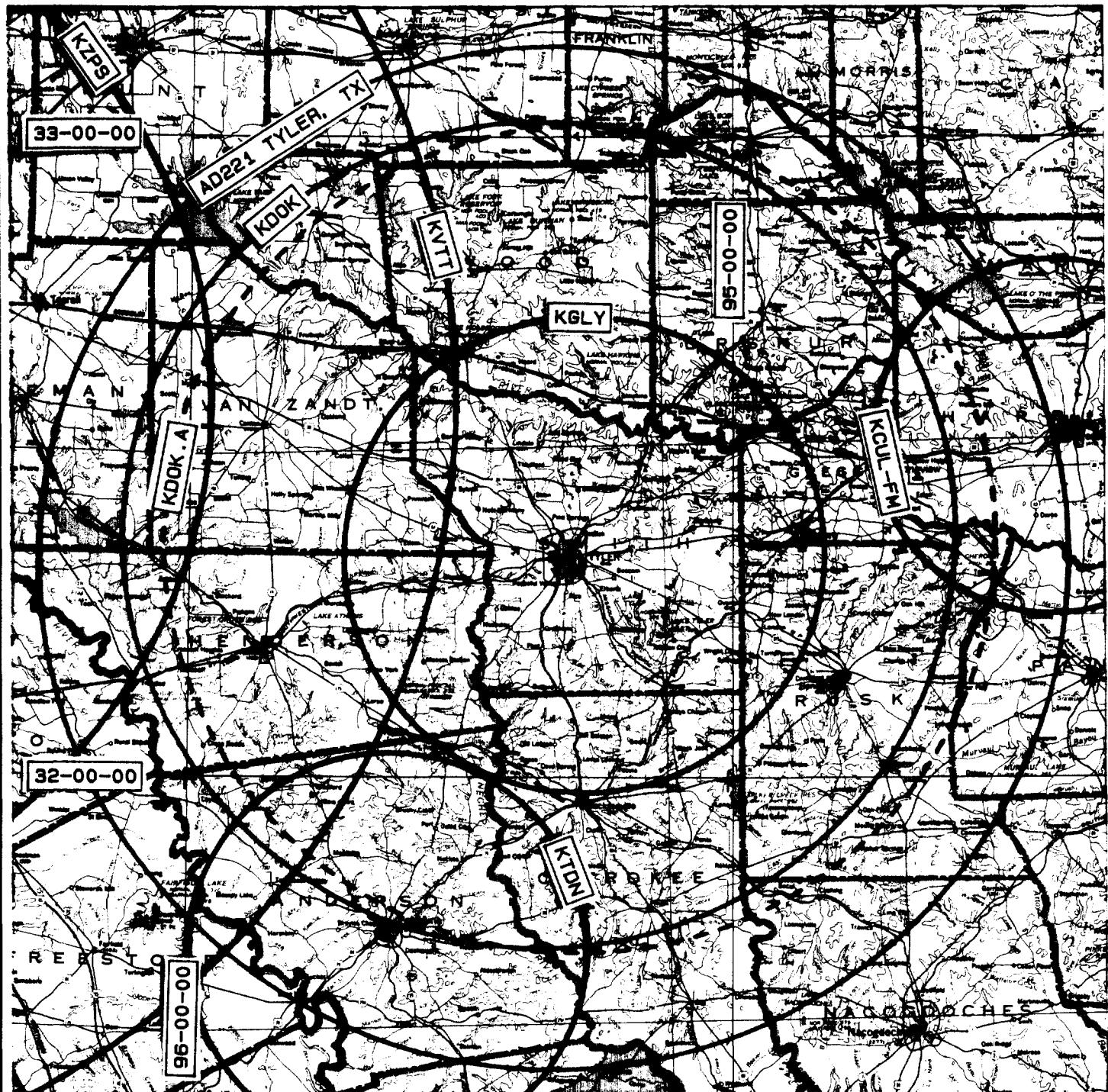
PETITION FOR RULE MAKING  
GLEISER COMMUNICATIONS INCORPORATED  
SUBSTITUTE CHANNEL 221C3 FOR 221A  
ORDER KDOK TO CHANGE CLASS  
TYLER, TEXAS  
January 1994

EXHIBIT #2A

Stations Considered in Preclusion Study  
Channel 219A

AD221, KDOK, KDOK.A      Channel 221      Tyler, TX  
(Subject station/proponent)

KVTT      Channel 219C      Dallas, TX  
100.0 kilowatts 335 meters HAAT  
Preclusionary arc 204.5 kilometers



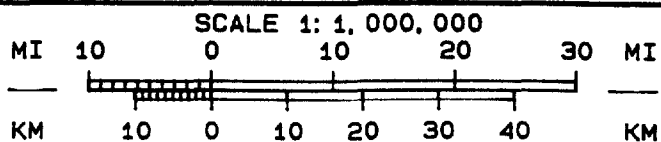
# CHANNEL 220A PRECLUSION STUDY

MAP IS A PORTION OF THE 1: 1, 000, 000 SCALE U.S.G.S. BASE MAP OF TEXAS.

SEE EXHIBIT #3A FOR THE LIST OF STATIONS SHOWN ON EXHIBIT #3.

# EXHIBIT #3

PETITION FOR RULE MAKING  
GLEISER COMM., INC.  
KOOK RADIO STATION  
SUB CH 221C3 FOR CH 221A  
TYLER, TEXAS  
January 1994



**GRAHAM BROCK, INC.**  
BROADCAST TECHNICAL CONSULTANTS

PETITION FOR RULE MAKING  
GLEISER COMMUNICATIONS INCORPORATED  
SUBSTITUTE CHANNEL 221C3 FOR 221A  
ORDER KDOK TO CHANGE CLASS  
TYLER, TEXAS  
January 1994

EXHIBIT #3A

Stations Considered in Preclusion Study  
Channel 220A

AD221, KDOK, KDOK.A      Channel 221      Tyler, TX  
(Subject station/proponent)

KGLY      Channel 217C3      Tyler, TX  
12.0 kilowatts 141 meters HAAT  
Preclusionary arc 41.5 kilometers

KVTT      Channel 219C      Dallas, TX  
100.0 kilowatts 335 meters HAAT  
Preclusionary arc 137.5 kilometers

KTDN      Channel 218A      Palestine, TX  
0.55 kilowatts 158 meters HAAT  
Preclusionary arc 34.6 kilometers

KCUL-FM      Channel 222A      Marshall, TX  
Preclusionary arc 31.0 kilometers

KZPS      Channel 223C      Dallas, TX  
Preclusionary arc 95.0 kilometers



**PETITION FOR RULE MAKING**  
**GLEISER COMMUNICATIONS INCORPORATED**  
**SUBSTITUTE CHANNEL 221C3 FOR 221A**  
**ORDER KDOK TO CHANGE CLASS**  
**TYLER, TEXAS**  
**January 1994**

**EXHIBIT #4A**

**Stations Considered in Preclusion Study**  
**Channel 220C3**

**AD221, KDOK, KDOK.A      Channel 221      Tyler, TX**  
**(Subject station/proponent)**

**KVTT      Channel 219C      Dallas, TX**  
**100.0 kilowatts 335 meters HAAT**  
**Preclusionary arc 148.3 kilometers**

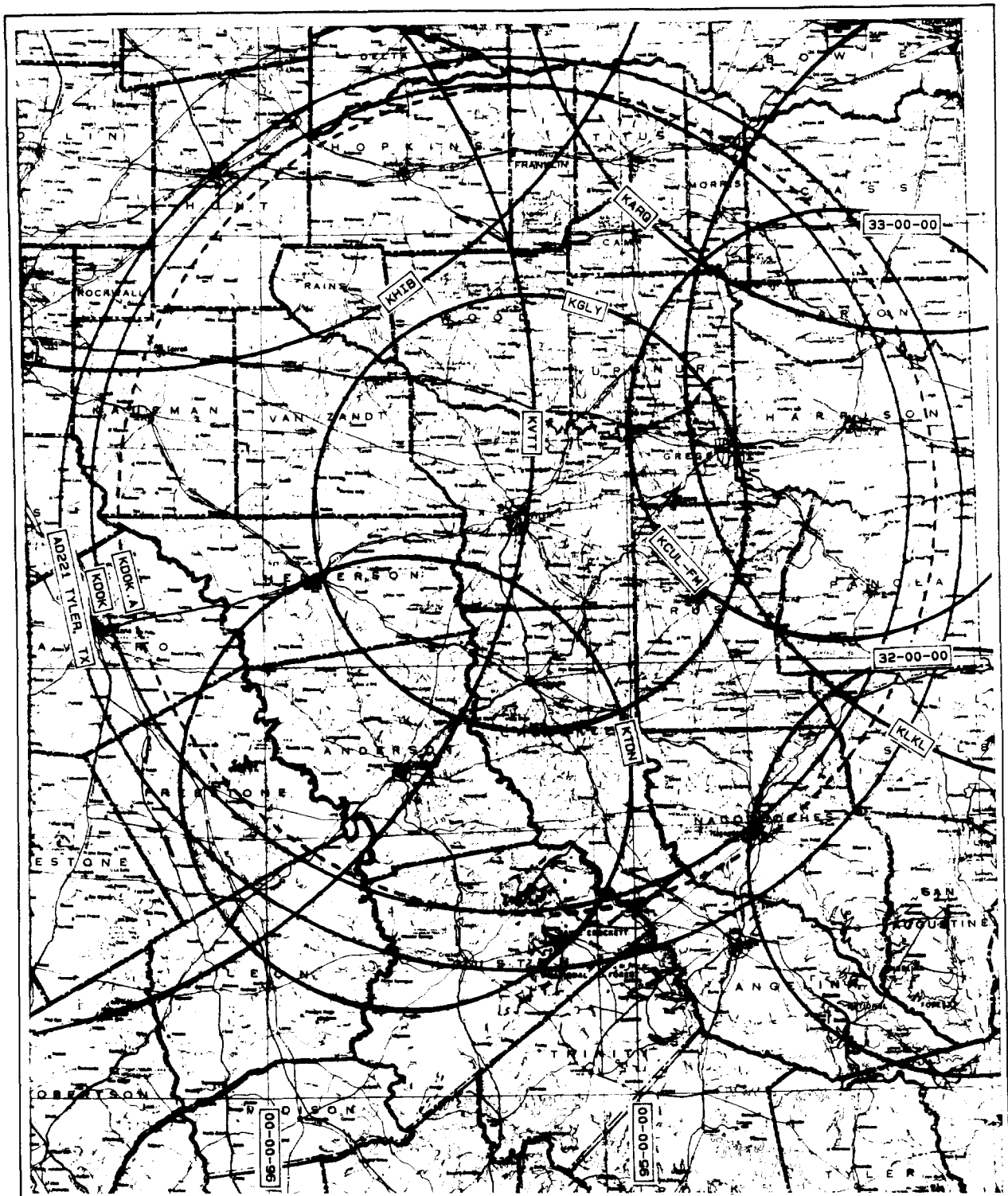
**KTDN      Channel 218A      Palestine, TX**  
**0.55 kilowatts 158 meters HAAT**  
**Preclusionary arc 45.4 kilometers**

**KCUL-FM      Channel 222A      Marshall, TX**  
**Preclusionary arc 42.0 kilometers**

**KHIB      Channel 220A      Durant, OK**  
**0.32 kilowatts 41 meters HAAT**  
**Preclusionary arc 122.5 kilometers**

**KLKL      Channel 221A      Benton, LA**  
**Preclusionary arc 89.0 kilometers**

**KARQ      Channel 221A      Ashdown, AR**  
**Preclusionary arc 89.0 kilometers**



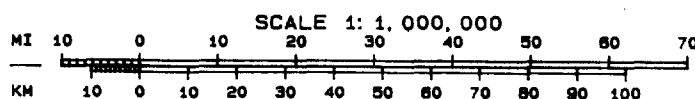
# CHANNEL 220C2 PRECLUSION

MAP IS A PORTION OF THE 1: 1, 000, 000 SCALE  
U.S.G.S. BASE MAP OF TEXAS.

SEE EXHIBIT #5A FOR THE LIST OF STATIONS  
SHOWN ON EXHIBIT #5.

## EXHIBIT #5

PETITION FOR RULE MAKING  
GLEISER COMM., INC.  
KDOK RADIO STATION  
SUB CH 221C3 FOR CH 221A  
TYLER, TEXAS  
January 1994



**GRAHAM BROCK, INC.**  
BROADCAST TECHNICAL CONSULTANTS

**PETITION FOR RULE MAKING**  
**GLEISER COMMUNICATIONS INCORPORATED**  
**SUBSTITUTE CHANNEL 221C3 FOR 221A**  
**ORDER KDOK TO CHANGE CLASS**  
**TYLER, TEXAS**  
**January 1994**

**EXHIBIT #5A**

**Stations Considered in Preclusion Study**  
**Channel 220C2**

**AD221, KDOK, KDOK.A            Channel 221            Tyler, TX**  
**(Subject station/proponent)**

**KVTT                            Channel 219C            Dallas, TX**  
**100.0 kilowatts 335 meters HAAT**  
**Preclusionary arc 161.4 kilometers**

**KTDN                            Channel 218A            Palestine, TX**  
**0.55 kilowatts 158 meters HAAT**  
**Preclusionary arc 58.5 kilometers**

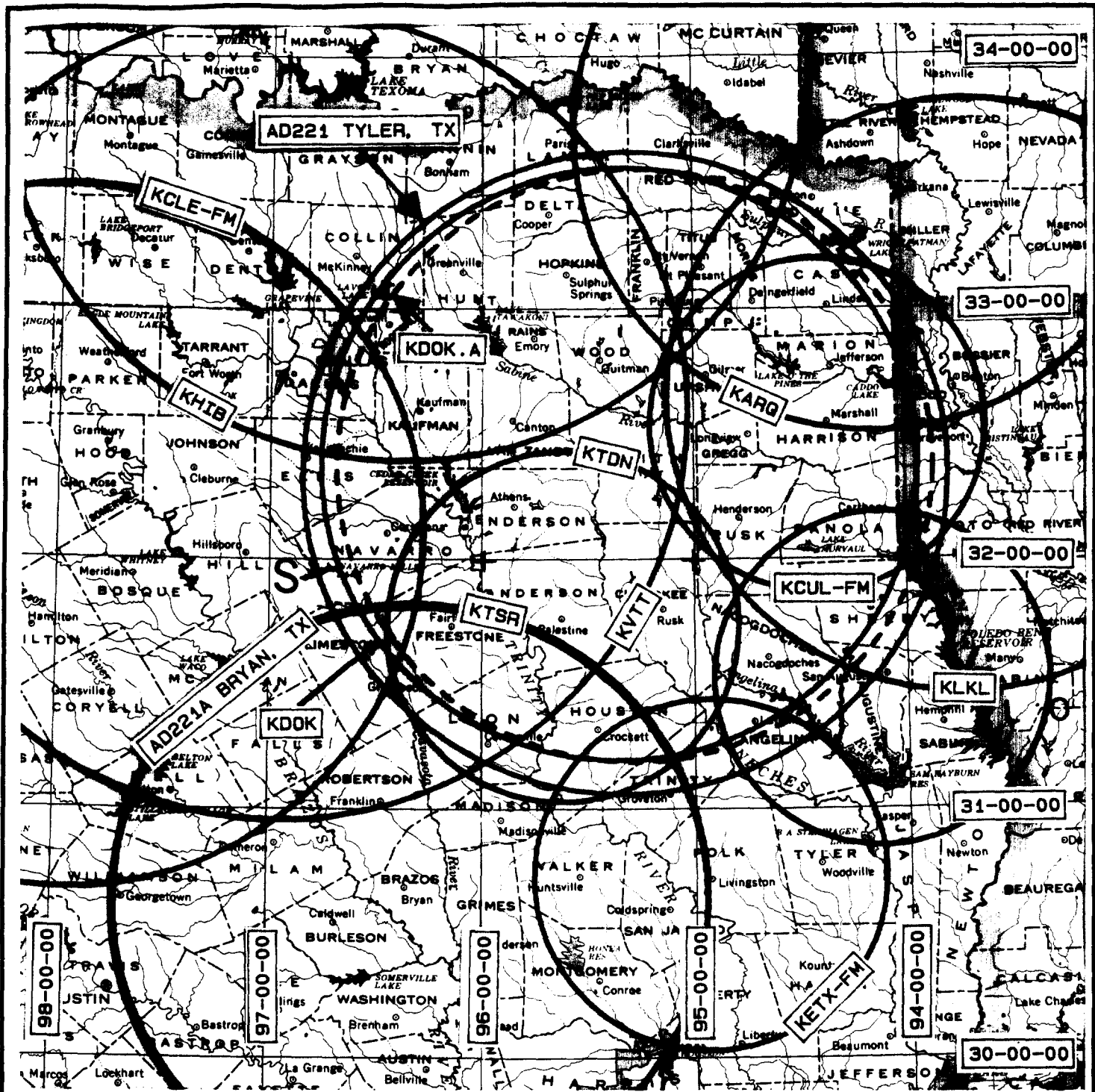
**KCUL-FM                        Channel 222A            Marshall, TX**  
**Preclusionary arc 55.0 kilometers**

**KHIB                            Channel 220A            Durant, OK**  
**0.32 kilowatts 41 meters HAAT**  
**Preclusionary arc 146.6 kilometers**

**KLKL                            Channel 221A            Benton, LA**  
**Preclusionary arc 106.0 kilometers**

**KARQ                            Channel 221A            Ashdown, AR**  
**Preclusionary arc 106.0 kilometers**

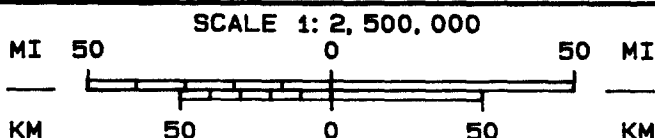
**KCOT                            Channel 223A            San Augustine, TX**  
**Preclusionary arc 55.0 kilometers**



# CHANNEL 220C1 PRECLUSION STUDY

MAP IS A COMPOSITE OF THE 1: 2, 500, 000  
SCALE U.S.G.S. EASTERN AND WESTERN  
UNITED STATES MAPS.

SEE EXHIBIT #6A FOR THE LIST OF STATIONS  
SHOWN ON EXHIBIT #6.



## EXHIBIT #6

PETITION FOR RULE MAKING  
GLEISER COMM., INC.  
KDOCK RADIO STATION  
SUB CH 221C3 FOR CH 221A  
TYLER, TEXAS  
January 1994

**GRAHAM BROCK, INC.**  
BROADCAST TECHNICAL CONSULTANTS



**PETITION FOR RULE MAKING**  
**GLEISER COMMUNICATIONS INCORPORATED**  
**SUBSTITUTE CHANNEL 221C3 FOR 221A**  
**ORDER KDOK TO CHANGE CLASS**  
**TYLER, TEXAS**  
**January 1994**

**EXHIBIT #6A**  
**Stations Considered in Preclusion Study**  
**Channel 220C1**

**AD221, KDOK, KDOK.A      Channel 221      Tyler, TX**  
**(Subject station/proponent)**

**KVTT                      Channel 219C      Dallas, TX**  
**100.0 kilowatts 335 meters HAAT**  
**Preclusionary arc 181.5 kilometers**

**KTDN                      Channel 218A      Palestine, TX**  
**0.55 kilowatts 158 meters HAAT**  
**Preclusionary arc 78.6 kilometers**

**KCUL-FM                  Channel 222A      Marshall, TX**  
**Preclusionary arc 75.0 kilometers**

**KHIB                      Channel 220A      Durant, OK**  
**0.32 kilowatts 41 meters HAAT**  
**Preclusionary arc 180.8 kilometers**

**KLKL                      Channel 221A      Benton, LA**  
**Preclusionary arc 133.0 kilometers**

**KARQ                      Channel 221A      Ashdown, AR**  
**Preclusionary arc 133.0 kilometers**

**KCOT                      Channel 223A      Ashdown, AR**  
**Preclusionary arc 75.0 kilometers**

**AD221A                  Channel 221A      Bryan, TX**  
**Preclusionary arc 133.0 kilometers**

**KARQ                      Channel 221A      Ashdown, AR**  
**Preclusionary arc 133.0 kilometers**

**KTSR                      Channel 221A      College Station, TX**  
**Preclusionary arc 133.0 kilometers**

**KCLE-FM                  Channel 221C2      Glen Rose, TX**  
**Preclusionary arc 158.0 kilometers**

**KETX-FM                  Channel 222C2      Livingston, TX**  
**Preclusionary arc 79.0 kilometers**